

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
(ALEXANDRIA DIVISION)

ROBERTO CLAROS et al.,

Plaintiffs,

v.

SWEET HOME IMPROVEMENTS, INC.,
et al.,

Defendants

Case No: 1:16-CV-344-AJT-MSN

Hearing Date: August 5, 2016
10:00 a.m.

Plaintiffs' Exhibits, Witnesses, and Uncontested Facts

A. Exhibits – Will Introduce

1. Carbon-copies of checks made out to Roberto Claros
2. Printout of bounced check #3648 made out to José Claros
3. Timesheets prepared by José Claros
4. Photographs of timesheets prepared by José Claros
5. Photographs of text messages between Myung Kwan Koo and Hector Antonio Andrade
6. Printout of bounced check #3372 made out to Hector Antonio Andrade

B. Exhibits – May Introduce

1. The Amended Complaint (ECF No. 5) and Defendants' Answer thereto (ECF No. 10);
2. Defendants' initial and supplemental interrogatory responses;
3. Defendants' responses to Plaintiffs' requests for production of documents;
4. Time records prepared by José Claros

C. Witnesses – Will Call

1. José Claros
2. Roberto Claros
3. Hector Antonio Andrade

D. Witnesses – May Call

1. Myung Kwan Koo
2. Miae Koo
3. Osbaldo Lopez
4. Fredy Zamorano
5. Mario Herrera Macurán

E. Uncontested Facts

1. Defendant Sweet Home Improvements, Inc. is a Virginia corporation. [Amended Complaint, ECF No. 5 (“Am. Compl.”) at ¶9; Answer to Amended Complaint, ECF No. 10 (“Answer”) at ¶9].
2. Defendant Myung Kwan Koo is a Sweet Home director. He is also the corporation’s President. [Am. Compl. at ¶10; Answer at ¶10].
3. Miae Koo was a Sweet Home director and registered agent at the time relevant to this litigation. [Answer at ¶11].
4. Defendants maintain an office and showroom in Annandale, Virginia. [Am. Compl. at ¶12; Answer at ¶12].
5. The Koos are the owners of Sweet Home. [Am. Compl. at ¶13; Answer at ¶13].
6. Defendants are in the residential construction and remodeling business. [Am. Compl. at ¶14; Answer at ¶14.]
7. Defendants Myung Kwan Koo and Miae Koo control the day-to-day operations of Sweet Home. [Am. Compl. at ¶15, Answer at ¶15].

8. Defendants instructed Plaintiffs which construction or remodeling projects to work on throughout the day. [Am. Compl. at ¶18; Answer at ¶18].
9. Defendants perform residential construction and remodeling services in multiple states, including Virginia, Maryland, and the District of Columbia. [Am. Compl. at ¶20; Answer at ¶20].
10. At all relevant times, Defendants had an annual gross volume of business of over \$500,000. [Am. Compl. at ¶21; Answer at ¶21].
11. Defendants have at least two employees who are engaged in interstate commerce, or who handle, sell, or otherwise work on goods or other materials that have moved in interstate commerce. [Am. Compl. at ¶22; Answer at ¶22].

Respectfully submitted,

/s/ Nicholas Cooper Marritz

September 14, 2016

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Certificate of Service

I hereby certify that on September 14, 2016, I uploaded the foregoing *Plaintiffs' Exhibits, Witnesses, and Uncontested Facts* to the Court's CM/ECF system, which will cause a Notice of Electronic Filing to be sent to Defendants' counsel of record:

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